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JUN 14 2022	
CLERK U.S. DISTRICT COURT	
WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY	DEPUTY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Marlin Giovanni  
Pickens

Plaintiff(s),

v.

Central Intelligence  
Agency

Defendant(s).

CASE NO. 3:22-cv-5438-MJP  
[to be filled in by Clerk's Office]

COMPLAINT FOR VIOLATION  
OF CIVIL RIGHTS  
(for use only by plaintiffs not in  
custody)

Jury Trial:  Yes  No

## I. THE PARTIES TO THIS COMPLAINT

### A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Marlin Giovanni Pickens

Street Address

2044 East Gregory Street

City and County

Tacoma, Pierce

State and Zip Code

Washington, 98404

Telephone Number

(253) 785-1201

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1 B. Defendant(s)

2       Provide the information below for each defendant named in the complaint, whether the  
3 defendant is an individual, a government agency, an organization, or a corporation. For an  
4 individual defendant, include the person's job or title (if known). Attach additional pages if  
needed.

5       Defendant No. 1

6           Name

Please see attached

7           Job or Title (if known)

8           Street Address

9           City and County

10          State and Zip Code

11          Telephone Number

12           Individual capacity

13           Official capacity

14       Defendant No. 2

15           Name

16           Job or Title (if known)

17           Street Address

18           City and County

19          State and Zip Code

20          Telephone Number

21           Individual capacity

22           Official capacity

23       Defendant No. 3

24           Name

25           Job or Title (if known)

26           Street Address

27           City and County

28          State and Zip Code

29          Telephone Number

30           Individual capacity

31           Official capacity

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1 Defendant No. 4

2 Name \_\_\_\_\_

3 Job or Title (*if known*) \_\_\_\_\_

4 Street Address \_\_\_\_\_

5 City and County \_\_\_\_\_

6 State and Zip Code \_\_\_\_\_

7 Telephone Number \_\_\_\_\_

8  Individual capacity

□ Official capacity

## II. PREVIOUS LAWSUITS

9 Have you brought any other lawsuits in any federal court in the United States?:

10  No

Yes

If yes, how many? Click here to enter text..

11 Describe the lawsuit:

12 Please see attached

13 Parties to this previous lawsuit:

14 \_\_\_\_\_  
15 \_\_\_\_\_  
16 \_\_\_\_\_  
17 \_\_\_\_\_  
18 \_\_\_\_\_  
19 \_\_\_\_\_  
20 \_\_\_\_\_  
21 \_\_\_\_\_

22 Plaintiff(s)

23 \_\_\_\_\_  
24 \_\_\_\_\_

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1 \_\_\_\_\_  
2 \_\_\_\_\_  
3 Defendant(s)  
4 \_\_\_\_\_  
5 \_\_\_\_\_  
6 \_\_\_\_\_  
7 \_\_\_\_\_  
8 *(If there is more than one previous lawsuit, describe the additional lawsuits on another  
piece of paper using the same outline. Attach additional sheets, if necessary)*  
9 Court and name of district:  
10 \_\_\_\_\_  
11 Docket Number: Click here to enter text.  
12 Assigned Judge: Click here to enter text.  
13 Disposition: *(For example, was the case dismissed as frivolous or for failure to state a  
claim? Was it appealed? Is it still pending?)*  
14 \_\_\_\_\_  
15 \_\_\_\_\_  
16 \_\_\_\_\_  
17 \_\_\_\_\_  
18 Approximate filing date of lawsuit: Click here to enter date.  
19 Approximate date of disposition: Click here to enter date.  
20  
21 **III. BASIS FOR JURISDICTION**  
22 Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any  
23 rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens*  
24

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1 v. *Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may  
2 sue federal officials for the violation of certain constitutional rights.

3 A. Are you bringing suit against (*check all that apply*):

- 4  Federal officials (a *Bivens* claim)  
5  State or local officials (a § 1983 claim)

6 B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or  
7 immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are  
8 suing under section 1983, what federal constitutional or statutory right(s) do you claim  
9 is/are being violated by state or local officials?

10 \_\_\_\_\_  
11 \_\_\_\_\_  
12 \_\_\_\_\_  
13 \_\_\_\_\_

14 C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional  
15 rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are  
16 being violated by federal officials?

17 Please see attached  
18 \_\_\_\_\_  
19 \_\_\_\_\_  
20 \_\_\_\_\_

21 D. Section 1983 allows defendants to be found liable only when they have acted "under  
22 color of any statute, ordinance, regulation, custom, or usage, of any State or Territory  
23 or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983,  
24 explain how each defendant acted under color of state or local law. If you are suing

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under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Please see attached

#### **IV. STATEMENT OF CLAIM**

8 State as briefly as possible the facts of your case. Describe how each defendant was personally  
involved in the alleged wrongful action, along with the dates and locations of all relevant events.  
9 You may wish to include further details such as the names of other persons involved in the events  
giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted,  
10 number each claim and write a short and plain statement of each claim in a separate paragraph.  
Attach additional pages if needed.

Please see attached

A. Where did the events giving rise to your claim(s) occur?

B. What date and approximate time did the events giving rise to your claim(s) occur?

C. What are the facts underlying your claim(s)? (For example: What happened to you?)

*Who did what? Was anyone else involved? Who else saw what happened?)*

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1  
2                   **V. INJURIES**

3     *If you sustained injuries related to the events alleged above, describe your injuries and state*  
4     *what medical treatment, if any, you required and did or did not receive.*

5  
6     Please see attached  
7  
8

9  
10                  **VI. RELIEF**

11     *State briefly what you want the court to do for you. Make no legal arguments. Do not cite any*  
12     *cases or statutes. If requesting money damages, include the amounts of any actual damages*  
13     *and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.*

14  
15     Please see attached  
16  
17  
18  
19  
20  
21  
22  
23  
24

15                  **VII. CERTIFICATION AND CLOSING**

16     Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my  
17     knowledge, information, and belief that this complaint: (1) is not being presented for an improper  
18     purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;  
19     (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or  
20     reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so  
21     identified, will likely have evidentiary support after a reasonable opportunity for further  
22     investigation or discovery; and (4) the complaint otherwise complies with the requirements of  
23     Rule 11.

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I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

06/14/2022

Signature of Plaintiff

Marlin Pickens

Printed Name of Plaintiff

Marlin Giovanni Pickens

Date of signing:

\_\_\_\_\_

Signature of Plaintiff

\_\_\_\_\_

Printed Name of Plaintiff

\_\_\_\_\_

Date of signing:

\_\_\_\_\_

Signature of Plaintiff

\_\_\_\_\_

Printed Name of Plaintiff

\_\_\_\_\_

Signature of Plaintiff

\_\_\_\_\_

Printed Name of Plaintiff

\_\_\_\_\_